Appendix D SWQMP Public Outreach Activities

Outreach activities undertaken by the Colorado Department of Public Health and Environment Water Quality Control Division (WQCD) during development of the public notice draft Statewide Water Quality Management Plan (SWQMP) are summarized below, as are responses to major comments received as a result of this outreach.

Public Outreach Activities

Citizens Advisory Group (CAG)

The WQCD maximized opportunity for public outreach by convening a CAG. Potential CAG members were identified and invited to participate at the beginning of SWQMP development. The individuals identified were recognized by the WQCD as statewide, regional, or local watershed leaders who have a demonstrated interest and commitment to water quality management. The potential candidates also generally provided representation of the state's seven major river basins.

Of the 16 individuals invited, 11 were able to participate on the CAG. As the SWQMP was developed, several additional people notified the WQCD of their interest in being involved with the CAG. The final list of the 13 CAG participants is provided as Appendix B to the SWQMP.

The Division held three CAG meetings during the SWQMP development process:

- July 20, 2010
- October 26, 2010
- January 11, 2011

Initially, the purpose of the meetings was to discuss and refine the scope of the SWQMP and to share information in support of meeting that scope. Later, the CAG provided comments on preliminary draft SWQMP chapters.

Representatives of the Designated Regional Water Quality Planning Agencies (Designated Planning Agencies)

Input from the designated planning agencies was critical to drafting the SWQMP. The WQCD met with designated planning agency representatives before SWQMP development began. The meeting was an opportunity to provide information about the SWQMP and was also an initial scoping discussion to help refine the SWQMP in the early stages of development. Designated planning agency representatives on the CAG continued to provide feedback as the SWQMP was written.

General Stakeholder Involvement and Education

The WQCD presented an overview of the SWQMP at the 2010 Sustaining Colorado Watersheds Conference in October 2010. Public input was received as a result of the presentation.

Information Sessions with Water Quality Control Commission (WQCC)

The WQCD provided SWQMP informational briefings to the WQCC in July and December 2010. These informational briefings were an informal opportunity for public feedback. No public input was received as a result of the briefings.

Public Notice of Administrative Action Hearing (AAH)

On February 8, 2011, the WQCC issued a Notice of Public Administrative Action Hearing Before The Colorado Water Quality Control Commission (Public Notice). The Public Notice identifies an opportunity for public comment on the SWQMP beginning in March 2011 and ending with the AAH on April 11, 2011.

Summary Response to Comments Received During SWQMP Development

The WQCD tracked specific comments received throughout development of the SWQMP. A summary of responses to the major comments received is provided below. The WQCD addressed the majority of input provided by reviewers through revisions to the document; the primary exceptions were those comments determined to be outside the purpose or scope of the SWQMP and those comments that although consistent with purpose or scope, could not be addressed because of time and resource limitations. A number of the unresolved comments served as the basis for information gaps identified in Chapter 5 of the SWQMP. Comments received as a result of the AAH process will be addressed and included in the responsiveness summary as part of producing a final SWQMP.

I. General Comment: The WQCD received several comments about the purpose of the SWQMP. Some reviewers noted the SWQMP was more of a compilation of information than a plan. Others commented that strategies should not be the focus of the document, but rather, the focus should be on presenting an overview of statewide water quality status and management. Some noted that the purpose of the document needed to be clarified to include: meeting requirements defined in federal regulation for water quality management plans; providing an educational tool for a broad audience; and promoting water quality improvement.

Response: The WQCD agrees with the purpose comments received. Because the SWQMP is foundational and is intended as a framework to build from into the future, the focus is on compilation of information, rather than on a specific planning horizon or on strategies development. The SWQMP is also intended to not only meet federal water quality management plan requirements but to educate and highlight opportunities for water quality improvement. Changes were made to the document to clarify purpose based on the comments received.

- II. General Comment: The WQCD received numerous comments about scope of the SWQMP. The scope comments dealt primarily with temporal scale, geographic scale, and the scope of substantive information included in the SWQMP.
 - a. Temporal scale: Several reviewers suggested that more information about future projections be included. For example, some noted that future stressors, projected trends, and population forecasts should be addressed in the SWQMP. Comments were also provided requesting inclusion of the most current information available and suggesting that if information will change significantly overtime, it should not be included in the SWQMP. Response: Future projections are not specifically included in the SWQMP because the foundation for this iteration of plan development is based on existing information, primarily from the 2010 Integrated Report. For the information provided other than that from the 2010 Integrated Report, every attempt was made to use the most current sources available. Priority was also placed on using information that is stable overtime in development of the SWQMP.
 - b. Geographic scale: Numerous comments were received about inclusion of information from regional water quality plans (208 plans) and from watershed plans. Some reviewers specified the scale at which specific types of information should be addressed. It was also suggested that as a part of SWQMP development, water quality planning boundaries for the state should be changed to represent watersheds rather than geopolitical boundaries, and there was a request that the statewide scale of the SWQMP be clarified, especially with respect to the watershed approach discussed in the document.

Response: The framework for the SWQMP is defined in federal regulation, and that framework incorporates information from 208 plans. Therefore, the SWQMP includes information from existing 208 plans, primarily through incorporation. Specific content of watershed plans is not included in the SWQMP for a number of reasons. For example, the plan is presented at a statewide scale rather than a watershed scale, and therefore, all information in the SWQMP is focused at a statewide scale. It was also necessary to prioritize sources of information for the SWQMP because time and resources were limited. Existing water quality planning boundaries are utilized in the SWQMP, but information is also represented based on watershed boundaries. The watershed-based content serves as the basis for compilation of information at a statewide scale. This representation of information at different geographic scales, with the primary focus on a statewide scale, has been clarified in the text.

c. Scope of substantive information: In order to present the best available information in support of water quality planning, many reviewers suggested additional sources and types of information for inclusion in the SWQMP. The WQCD received draft text from some reviewers for the plan. There were also several comments received about what information should not be included in the plan, and some noted the need to present consistent information for all areas of the state. Many reviewers also suggested a

number of clarifications to make sources, types, and limitations of information used in the SWQMP more transparent.

Response: A priority in developing the SWQMP was to use existing, readilyavailable, consistent information that is already systematically gathered and evaluated by the WOCD. For example, much of the information in the plan is based on the 2010 Integrated Report. The systematically-developed, consistent, statewide information developed by the Colorado Water Conservation Board is also a source for much of the plan's content. Prioritizing these types of information and sources is consistent with the purpose and scope of the SWQMP, maximizes the use of limited time and resources available for plan development, and also facilitates sustainability of the plan overtime. Based on comments received, a number of additional sources and types of information were added to the SWQMP, and some information was removed. For example, wetlands information was included, and groundwater content was augmented. For those circumstances where actual content could not be added, every attempt was made to provide additional references for the reader to pursue to obtain more information. A number of comments received about sources and types of information served as the basis for information gaps discussed in Chapter 5 of the SWQMP. The SWQMP also reflects the requested clarifications about sources, types, and limitations of information used for the plan.

III. General Comment: The WQCD received a number of comments about accuracy and quality control of information provided in the SWQMP.

Response: The 2010 Integrated Report and associated database are the sources of information for much of the content included in the SWQMP. There is a system in place to ensure accuracy and other quality measures for these sources of information. However, as with all sources, there are limitations, and such limitations were then translated as materials were compiled for the SWQMP. In response to comments received, every attempt was made to reconcile the accuracy and quality issues raised. Sources were re-checked and re-evaluated, and the compilation of information was reassessed. The SWQMP represents a compilation of internally and externally derived information, including information produced by a variety of public and other outside sources. There are no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, or suitability with respect to any information derived from such outside sources.

IV. General Comment: The WQCD received several comments about integration and coordination of the SWQMP with existing information, activities, and processes.

Response: The SWQMP is a statewide document that is intended to be coordinated with existing information, activities, and processes. Priority was given to outreach during development of the SWQMP in order to facilitate such coordination and integration. The SWQMP is not intended to replace or duplicate existing efforts such as 208 planning. It is also not intended to provide specific analyses or strategies because the scale of the SWQMP is statewide and such specifics are the focus of other existing efforts.

- V. General Comment: The WQCD received several comments about processes associated with the SWQMP. In particular, input regarding public outreach processes and approval processes for the SWQMP was provided.
 - Response: Time and resource limitations constrained the amount of public outreach undertaken during the development of the SWQMP. The WQCD maximized outreach by convening the CAG, a group with broad representation. The WQCD also solicited input and participation through presentations and informational briefings, as well as through a public review process associated with the WQCC AAH. The hearing, with a subsequent evaluation by the U.S. Environmental Protection Agency, is the approval process for the SWQMP.
- VI. General comment: The WQCD received a number of comments about organization and structure of the SWQMP. Of particular interest was structuring the document to facilitate targeted use of the information and providing links to additional information/references.

Response: The SWQMP reflects revisions made to address the organizational and structural comments received. Input about formatting of the document was incorporated when possible.

Response to Public Notice and AAH Comments

#	Entity	Date	Comment	Resolution
1	CAM-Colorado LLC and CAM Mining LLC	03/28/11	Written comment: Request for inclusion of Lower Colorado River Segment 13e in SWQMP	The WQCD received numerous comments that involve the question of the adopted and effective date of the various policies, guidance, and regulations that are summarized by the SWQMP. Additionally, as currently envisioned, future version of the SWQMP will be updated in a piecewise manner with individual basin and overview chapter updates tied to the WQCC triennial review process. Given the dynamic nature of various regulatory actions, as well as the proposed piecewise updates to the SWQMP, the WQCD has concluded that a more formal system for tracking regulatory and policy changes need to be included in the SWQMP. To accomplish this more formal tracking system for the SWQMP the WQCD has elected to add an additional appendix which would tabulate the adopted and effective dates for the various regulatory and policy documents. An appendix represents a singular location for maintaining pertinent information which is easily updated and maintained. The appendix would also facilitate future SWQMP updates, as it could be used to identify all changes that had taken place since the last version.

				Specifically regarding Colorado Segment 13e, the SWQMP utilize the February 8, 2010 adoption of Regulation 37 (effective 6/30/2010), and therefore the resegmentation adopted on January 10, 2011 was not included in the current version of the SWQMP. The WQCD has elected not to include this change in the SWQMP because, first and foremost, this change is not scheduled to go into effect until June 30, 2011. Secondly, as future updates to the SWQMP are currently planned to be piecewise, the WQCD cannot commit to logistics and resources needed to maintain and track incremental updates, and prefers to address basin updates systematically. The WQCD will include segment 13e during the next Colorado basin update.
2	Pioneer Natural Resources USA, Inc.	03/30/11	Written comment: Section 6-83 lists selenium impairments on the Purgatoire River. An ongoing comprehensive water quality monitoring program upgradient of the Trindad Reservoir indicates that the selenium standards may not be currently exceeded for these segments.	The SWQMP, in its current form, is a foundational document to inform water quality planning efforts throughout the state. To this end, SWQMP Exhibit 6-47 (p. 6-83) summarizes the water quality impairments that were identified in the 2010 Integrated Report (IR). The impairments in the IR are based on the 2010 303(d) list. The 303(d) list in considered by the WQCC on a two-year cycle that includes both a listing methodology process and a formal Rulemaking Hearing regarding the 303(d) list. The SWQMP was never intended to replace this process.

				The upcoming 2012 303(d) list and IR process is already underway. The WQCD will accept third-party data for consideration during this process, and this process represents the more appropriate venue for consideration of such data as is described in this comment.
3	Pioneer Natural Resources USA, Inc.	03/30/11	Written comment: The table of Point Sources (Exhibit 6-61), and specifically double (or treble) counts CBM permits. Specifically, two Pioneer permits are listed for Lorencito Canyon, yet there is only one such permit (0048089).	In developing the SWQMP the WQCD elected to rely on publically available data sources, and therefore elected to use the easily accessed national Envirofacts database to populate this exhibit. Exhibit 6-61 was populated, as indicated in the "Source Info" column, with data from EnviroFacts. Since the WQCD was aware of that there can be a delay between local State permitting actions and subsequent updated information being available on Envirofacts, this Exhibit included the following footnote: "I Note this table identifies only NPDES facilities as contained in the publicly available data sources evaluated. Therefore, it should not be considered an all inclusive list.". The WQCD, by reviewing our existing files and documents, did investigate those CBM permits listed for Las Animas County in Exhibit 6-61. This review indicated that four of the listed general permits were terminated (and converted to other individual permits in the table), and one of the listed general permits had never been issued. All of the listed individual permits were otherwise found to be active. Additionally, two active permits were identified on Lorencito Canyon; permittees were listed as Red River Ranch Holding, LLC (permit 0048089) and Pioneer (permit 0047776).

4	Pioneer Natural Resources USA,	03/30/11	Written comment: The State's reference to the water from the Vermejo and Raton	The SWQMP does identify the Poison Canyon Formations as a major aquifer in the Raton Basin,
	Inc.		coal formations in the Raton Basin is misleading. The plan identifies CBM water as major aquifers (p.6-9), but fails to mention the overlying Poison Canyon formation, which covers half of the central Raton Basin	and states "The major aquifers of the Raton Basin include the Raton, Vermejo, and Trinidad formations, and the Cuchara and Poison Canyon [emphasis added] formations." (p.6-9). The stratigraphic thickness of the Raton Formation has been estimated to be between 1,000 to 1,600 feet within the Raton Basin. Similarly the Vermejo
				Formation is reported to have a stratigraphic thickness of between 80 and 550 feet. Both Formations are described geologically as coastalplain deposits of predominately interbeded shale, siltstone with sandstone, with lenticular coal beds. The WQCD has not identified any site-specific ground water classifications within either the Vermejo or Raton Formations, and thus believes that it is premature to consider these aquifers as solely CBM water.
5	Squire, Sanders & Dempsey, Ronda Sandquist	04/11/11	Hearing comment: Verbal reiteration of written comments provided on behalf of CAM-Colorado LLC, CAM Mining LLC, and Pioneer Natural Resources USA, Inc.	Please see the response to comment two, three, and four.

6	Squire, Sanders & Dempsey, Ronda Sandquist	04/11/11	Hearing comment: Document should be revised to clarify for what the plan will be used. For example, it seems clear from the content that the SWQMP does not constitute a plan with which compliance is required for discharge permit decision-making, i.e., it is not a 208 plan, so that should be clarified.	Please see the Executive Summary and Section 1.1, Purpose and Overview for a discussion of intended uses and integration with other planning documents, e.g., existing 208 plans.
7	Squire, Sanders & Dempsey, Ronda Sandquist	04/11/11	Hearing comment: Basin Plans should be dated.	The WQCD has incorporated a new Appendix A which tabulates WQCC policies and regulations that are utilized within the SWQMP. As future updates of the SWQMP are released Appendix A will be updated to incorporate the version and effective date of the various WQCC related references. Additionally, as chapters of the SWQMP are update, new versions will be dated in the footer to assist readers in determining the appropriate version of the basin plans.
8	U.S. EPA Region 8	03/29/11	Written comment: Program-specific comment, EPA is concerned that the statement in Section 2.3.3.1 on p. 2-20 does not accurately reflect state authorities under CWA. In general, states cannot require nonpoint sources to undertake certain control actions. Instead, the state must develop partnerships with nonpoint sources and others to encourage voluntary actions that will result in reductions in pollutant loadings."	The comment is incorporated in the Final Draft SWQMP. Section 2.3.3.1 is revised to include the proposed revision language: In general, states cannot do not require nonpoint sources to undertake certain control actions. Instead, the state must develops partnerships with nonpoint sources and others to encourage voluntary actions that will result in reductions in pollutant loadings.

			EPA requests that the state revise it to reflect the discretionary authority the CWA grants to states, but not EPA, to develop non-voluntary or regulatory approaches to address nonpoint source pollution. Possible revision language is provided below. In general, states do not require nonpoint sources to undertake certain control actions. Instead, the state develops partnerships with nonpoint sources and others to encourage voluntary actions that will result in	
9	U.S. EPA Region 8	03/29/11	reductions in pollutant loadings. Written comment: Program-specific comment, EPA believes that the	The comment is incorporated in the Final Draft SWQMP. Section 2.3.5.2 is revised by striking the
			following statement in Section 2.3.5.2 on p. 2-25 is incorrect and may cause unnecessary confusion:	newsletter statement: Finally, the nonpoint source newsletter, Colorado NPS Connection, is now published as an electronic- only newsletter. Past issues of the newsletter are
			Finally, the nonpoint source newsletter, Colorado NPS Connection, is now published as an electronic-only newsletter. Past issues of the newsletter are available on the League of Women Voters of Colorado's website under the section entitled, Colorado Water Protection Project, at	available on the League of Women Voters of Colorado's website under the section entitled, Colorado Water Protection Project, at http://www.ourwater.org
			http://www.ourwater.org	

			The League of Women Voters no longer	
			publishes the newsletter and is not	
			expected to maintain back issues. Back	
			issues of the Colorado NPS Connection	
			are now on NPS Colorado	
			(<u>http://www.npscolorado.com</u>). EPA	
			recommends updating the information	
			before the SWQMP is final.	
10	U.S. EPA Region 8	03/29/11	Written comment: Program-specific	Bullets one and two are incorporated in the Final
			comment, EPA has the following	Draft SWQMP. Section 3.6 is revised by striking
			suggestions regarding the discussion in	the following:
			Section 3.6 on p. 3-31 and Exhibit 3-41	There is some overlap in the categorization terms
			on p. 3-31 and 3-32:	used in the primary resources researched. A greater
			 Paragraph one includes the 	number of projects oculd likely be aggregated.
			statement: "There is some	1 0 00 0
			overlap in the categorization	The text is removed because it is an extraneous
			terms used in the primary	methodology discussion that does not add value to
			resources researched." It would	the substance of the discussion.
			be helpful to elaborate upon and	
			clarify this point. What is the	Bullet 3 is not reflected through changes to the
			impact of the overlap in terms of	Final Draft SWQMP because for this first iteration
			this discussion?	of the SWQMP, Chapter 3 information is a rollup
				of information specific to the Basin Plans. Because
			Paragraph one also includes the statement: "A greater number of	of this basin-scale, geographic overlay, the
			statement: "A greater number of	statewide Nonpoint Source Program projects were
			projects could likely be	not researched and are not available for inclusion at
			aggregated." This seems	
			extraneous to the discussion and	this time. The statewide Nonpoint Source Program
			may be confusing to the reader.	projects will be included in future SWQMP
			It may help with clarity to either	updates.
			explain the reference further or	
			remove the sentence.	With respect to adding clarification about "not
			 It may be helpful to add 	applicable," "none specified," and "other"
			statewide projects to this list and	functional categories, the WQCD is unable to

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			a brief discussion to Section 3.6	resolve at this time the context for use of these
			about their role in supporting the	terms for all of the applicable Nonpoint Source
			overall Nonpoint Source	Program projects but will address this point of
			Program. These projects affect	clarification in future SWQMP updates.
			or may affect all of the basins and	
			their inclusion would help	
			provide a more complete picture	
			of the program.	
			It may be helpful to define the "not	
			applicable" and "none specified"	
			functional categories in a footnote to the	
			exhibit. While "other" is a common	
			catchall, these terms can be difficult to	
			interpret and may be puzzling to readers.	
11	U.S. EPA Region 8	03/29/11	Written comment: Program-specific	The WQCD agrees with inclusion of low impact
11	U.S. El A Region 6	03/29/11	comment, EPA recommends that the	development/green infrastructure plan and strategy
				elements in future SWQMP updates.
			State develop a plan to require and/or	elements in future 5 w QMP updates.
			encourage low impact development or	With the control of t
			green infrastructure approaches dealing	With respect to inclusion of Urban Drainage and
			with the increasing issues of stormwater	Flood Control Districts Volume 3 as a reference,
			and its associated pollution and include	the WQCD agrees that Volume 3 is an important
			this strategy in future iterations of the	resource for regionally-specific information that
			SWQMP.	should be included in the SWQMP. However,
			 Addition of more detailed 	Volume 3 was not researched as part of SWQMP
			information or references to other	development and therefore cannot be referenced at
			planning documents would be	this time. The WQCD will incorporate Volume 3
			very helpful in future iterations of	information in future SWQMP updates. Specific to
			the SWQMP. As expected, this	the comment about the Platte Basin Plan LID/GI
				projects, the WQCD agrees but is unable to
			_ <u>* *</u>	complete additional research at this time to support
				•
			and there is no discussion of how	=
1		1	they will be used either in MS4	information requested in the comment.
			information or references to other planning documents would be very helpful in future iterations of the SWQMP. As expected, this document appears to be more of a limited status report than a plan. LID and GI are briefly mentioned and there is no discussion of how	development and therefore cannot be referenced at this time. The WQCD will incorporate Volume 3 information in future SWQMP updates. Specific to the comment about the Platte Basin Plan LID/GI projects, the WQCD agrees but is unable to complete additional research at this time to support revisions to the Final Draft SWQMP. Future SWQMP updates will include the type of

			permits or how they will be	
			encouraged voluntarily.	
			 There is no mention of Urban 	
			Drainage and Flood Control	
			Districts Volume 3, which should	
			be added as a reference.	
			In a review of the South Platte Basin	
			Plan, only mentions of LID or green	
			infrastructure were on page 11-174 for	
			Boulder County/Eldorado Springs (LID	
			and 11-194 Erie Sewage Treatment Plant	
			(GI). However, there was no mention of	
			what this involved. Explanation would	
			be helpful.	
12	U.S. EPA Region 8	03/29/11	Written comment: General comment,	The WQCD agrees with the comment. However,
	_		Throughout the document, writing out	the WQCD is unable to address document style
			each term at first use in each chapter	issues at this time. The comment will be resolved
			(e.g. Clean Water Act (CWA)) may help	in future SWQMP updates.
			with clarity. The document is described	-
			as designed for each chapter to stand	
			alone, so it seems reasonable to expect	
			that readers using individual chapters	
			will not have the acronym list. This is	
			done in some chapters, but not in all.	
13	U.S. EPA Region 8	03/29/11	Written comment: General comment,	The WQCD agrees with the comment and
	C		Throughout the document, to help with	appreciates the solutions offered. However, the
			understanding and interpretation, please	WQCD is unable to address document formatting
			keep exhibits in the text of the chapters	issues at this time. The comment will be resolved
			on the same page wherever the exhibit	in future SWQMP updates.
			itself will fit on one page. If necessary,	
			the reference to the exhibit in the text	
			could include the page number where the	
			exhibit and the text are on different	

			pages. Where the exhibit will not fit on	
			one page, making the break at a basin or	
1.4	TIG EDAD : 0	00/00/11	topic break would be helpful.	
14	U.S. EPA Region 8	03/29/11	Written comment: Acronym list	The comment is incorporated in the Final Draft
			comment, The acronym CDMG	SWQMP. The acronym list is revised to show
			(Colorado Division of Minerals and	CDMG only once.
			Geology) is listed twice.	
15	U.S. EPA Region 8	03/29/11	Written comment: Acronym list	The comment is incorporated in the Final Draft
			comment, Does the state use CDRMS or	SWQMP. The acronym list is revised as follows:
			DRMS to refer to the Colorado Division	
			of Reclamation, Mining, and Safety?	[Colorado] Division of Reclamation, Mining, and
			DRMS is listed as the acronym and	Safety
			appears later in the text, but the	•
			definition includes the bracketed	
			"[Colorado]".	
16	U.S. EPA Region 8	03/29/11	Written comment: Acronym list	The comment is incorporated in the Final Draft
			comment, The acronym NRD is defined	SWQMP. The acronym list is revised as follows:
			as the National Resource Drainage	, in the second
			Restoration Fund. Should "Drainage" be	Natural Resources Drainage Restoration Fund
			replaced with "Damages"?	Damages
17	U.S. EPA Region 8	03/29/11	Written comment: Section 1.2.3, p. 1-3,	The comment is incorporated in the Final Draft
			The first paragraph includes the	SWQMP. The text is revised as follows:
			following statement of SWQMP goals:	
				This plan identifies five basic goals ranging from:
			This plan identifies five basic goals	(1) prevention waterborne disease and reduce
			ranging from the prevention from	chronic public health risks from drinking water, (2)
			waterborne disease to the protection of	protect ion of all designated uses, (3) restore ation of
			all designated uses, restoration of	impaired water quality to attainable standards, (4)
			impaired water quality, provision of	provision of increase funding to water quality-
			increased funding to water quality-	related infrastructure and nonpoint source projects,
			related infrastructure and nonpoint	and (5) evaluate ion of Division services that are
			source projects, and evaluation of	currently not supported with adequate funding
1			Division services that are currently not	resources.

			supported with adequate funding resources. As all of the goals are mentioned, it might be helpful for clarity to present the goals as a bulleted or numbered list. For example, "This plan identifies five basic goals: 1) prevention of waterborne disease; 2) protection of all designated uses"	
18	U.S. EPA Region 8	03/29/11	Written comment: Section 1.3, p. 1-4, EPA recommends replacing the fourth sentence of the second paragraph with the following: It does not require or promote the use of any particular strategies through the discussion. EPA recommends making the following change to the fourth sentence of the fourth paragraph: The nonpoint discussion is essentially a summation of known CWA section 319 projects in the basin for the past five years. The sentence currently includes a 10-year timeline, but the executive summary says 5 years and only projects back to 2005 are included in the basin chapters.	The comment is incorporated in the Final Draft SWQMP. The text is revised as follows: • It is does not requireing or promoteing the use of any particular strategies through the discussion. The nonpoint discussion is essentially a summation of known CWA section 319 projects in the basin for the past 10 five years.

19	U.S. EPA Region 8	03/29/11	Written comment: Section 2.3.8.2, p.2-31, The third full paragraph on this page refers to the "Division of Mining, Reclamation and Safety." This should be the "Division of Reclamation, Mining, and Safety."	The comment is incorporated in the Final Draft SWQMP.
20	U.S. EPA Region 8	03/29/11	Written comment: Section 3.1, p. 3-1, The SWQMP states that the terms "305(b) report" and "integrated report" will be used interchangeably throughout the document. For clarity, we suggest using either "305(b) report" or "integrated report." Using the terms interchangeably may be confusing to readers.	The WQCD agrees with the comment. However, the WQCD is unable to address the issue at this time. The comment will be resolved in future SWQMP updates.
21	U.S. EPA Region 8	03/29/11	Written comment: Section 3.1.1, p. 3-2, EPA is concerned that an apparent contradiction between areas given for the State in Section 3.1 may be confusing for the readers. The total area of the State and the total areas of the river basins into which the State as a whole are divided should be the same total area as no part of the State lies outside of a watershed or basin, but the totals are different by approximately 200 square miles. Total area for the State in the first paragraph is 104,247 square miles and the total area for the river basins is 104,048 square miles in the second. Is there a watershed area that is not included in the Colorado	The comment is incorporated in the Final Draft SWQMP. The revised text is as follows: The rivers and streams in the seven basins comprise approximately 104,048 square miles in surface area (CWCB 2004) and There are approximately 105,30144 total stream miles statewide (WQCD 2002) (WQCD 2010a), and additional key statistics regarding each of the basins are provided in exhibit 3-3.

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			Water Conservation Board total as not	
			important to water supply? It may be	
			helpful to explain the differences,	
			perhaps as a footnote.	
22	U.S. EPA Region 8	03/29/11	Written comment: Exhibit 3-4, p. 3-3,	The comment is addressed in the Final Draft
			Most basins are reported as straight	SWQMP. The text is revised as follows:
			percents, but two have fractions of	
			percentages. Are these fractions	Platte River:
			important to this Report? If not, EPA	• Wyoming Basin: 0.5% 1%
			recommends using consistent significant	• High Plains: 53% 52%
			digits. Specifically:	Republican River:
			• In the Platte Basin, 0.5% is	• High Plains: 99.99% 100%
			reported for Wyoming Basin.	Southwestern Tablelands: 0.01%
			This 0.5% causes the total for the	Southwestern Tubletands. 0.0170
			Platte River to be 100.5%.	
			Recommend adjusting so that the	
			total is 100%.	
			The Republican River Basin is	
			reported in one hundredths of one	
			percent, unlike the rest of the	
			chart. Is there particular	
			importance to reporting 0.01%	
			Southwestern Table Lands as	
			opposed to 100% High Plains?	
			Adopting a rounding with <<1% (much	
			less than 1%) option for tables might	
			solve this issue here and in other tables	
			where it is desirable to show very small	
			amounts as present, but where they are	
			not statistically significant by	
			comparison with the rest of the cart.	
			Here, this would become 100% and	
			<1%.	

	1	1		T
23	U.S. EPA Region 8	03/29/11	Written comment: Exhibit 3-5, pp. 3-4	Exhibit 3-5 has been restructured to more
			and 3-5, EPA is concerned that the table	accurately report the distribution of various
			does not accurately reflect the total	endangered species, and the text describing the
			numbers of endangered, threatened, or	exhibit has been modified. During the redesign of
			species of state concern statewide.	Exhibit 3-5, the analogous table were reviewed for
			Accuracy of the per-basin information is	individual basins, and no issues were identified.
			unknown. For this to be true, there	
			would need to be a unique set of species	
			in each category for each basin and	
			DOW data shows that this is not the	
			case, rendering the analysis invalid.	
			Please see DOW's website for more	
			information. Two examples are	
			provided below:	
			The State DOW website shows	
			only two federally endangered	
			mammals, the Grey Wolf and the	
			Black Footed Ferret, in Colorado.	
			If these occur, or could occur, in	
			all 7 basins, there would still only	
			be two federally endangered	
			mammals. Are there no basins	
			where both species could occur?	
			 There are only 3 federally listed 	
			threatened mammals, the grizzly	
			bear, the Prebles Meadow	
			Jumping Mouse, and the Lynx,	
			according to the DOW website.	
			Both the table and the discussion in	
			Section 3.1.2 on 3-3 need to be revisited,	
			and the analysis and discussion redone.	
			and the analysis and discussion redolle.	

24	U.S. EPA Region 8	03/29/11	Written comment: Exhibit 3-6, p. 3-6,	The comment is resolved in the Final Draft
2-	O.B. LI II Region o	03/27/11	EPA wonders why land ownership in the	SWQMP. The text is revised as follows:
			Republican River Basin does not add to	Sw Qivii. The text is revised as follows.
			100% as the other basins do. Is Federal	Republican River:
			0.04% or 1%? Is one of the other	<u> </u>
				• Private: 92% 93%
			amounts xx.96? (Currently adds to	• Federal: 0.04%
			99.04%). For consistency when the rest	
			of the table is in full percentages,	
			perhaps the term <1% could be included	
			instead. This may be especially useful	
			when the total will not add to 100%	
			when the rounded and unrounded	
			amounts are added. (Example: Federal	
			<1%, Private 93% (assuming 92.96%),	
			State $7\% = 100\% + a \text{ bit}$	
25	U.S. EPA Region 8	03/29/11	Written comment: Section 3.1.5, p. 3-7,	The comment is resolved in the Final Draft
			The first paragraph includes the	SWQMP. The revised text is as follows:
			following three sentences:	
				Today, Colorado generates approximately four-
			Today, Colorado generates	fifths of its revenue through service <u>industries</u> , and
			approximately four-fifths of its revenue	approximately one-fifth of its revenue through
			through service industries. ³ Most of the	farming. Most of the service and manufacturing
			service and manufacturing work takes	work takes place in the state's urban areas.
			place in the state's urban areas.	Farming makes up the rest and mainly takes place
			Farming makes up the rest and mainly	in the eastern plains.
			takes place in the eastern plains.	
			EPA is concerned that these statements,	
			while true, may be misleading about the	
			importance of the service sector to rural	
			areas of Colorado. Large areas of many	
			basins – especially in the mountains and	
			western Colorado – are largely	

			dependent on tourism, so their economies are dominated by service-sector not agricultural jobs. EPA recommends editing this section to clarify the importance of the service sector in Colorado's rural economy.	
26	U.S. EPA Region 8	03/29/11	Written comment: Exhibit 3-8, pp. 3-7 and 3-8, EPA recommends changing the fourth sentence of Footnote 1 to read as follows: For the purposes of this exhibit, the two basins are treated as one and the same.	The comment is resolved in the Final Draft SWQMP. The revised text is as follows: For the purposes of this exhibit, the two basins are treated as one in and the same.
27	U.S. EPA Region 8	03/29/11	Written comment: Section 3.1.6, p. 3-10, The medium scenario with passive conservation is 65% growth, not 81%. Please correct both the discussion and the side bar. The correct percent change calculation for this is: {(1,607,700 – 974,500)/974,500} * 100% = 65% The high scenario without passive conservation in the side bar % is incorrect. It should be 98%. Please correct. (Same math as above.)	The comment is resolved in the Final Draft SWQMP. The revised text is as follows: Table: High without passive conservation: 71% 99% Medium with passive conservation: 81% 65% Citation: CWCB 2004 2010. Text: The increase in water demand is 81% under medium economic assumptions with and without passive conservation.
28	U.S. EPA Region 8	03/29/11	Written comment: Section 3.2.2.2, p. 3-14, This section includes two small subsections titled Total Segments and Total Stream Miles. It may make sense to combine these sections into one paragraph, as there is very little on stream segments. Whether or not the	These two sub-sections were not combined. Figure references were changed to coincide with the appropriate discussion in the text. Additional text was added to include discussion of the three highest, and the lowest basins for both segmentation and stream miles.

			sections are combined, it may make	
			sense to either discuss the stream miles,	
			segments and percent of State total for	
			all 7 basins; or to limit the discussion to	
			the three highest basins and the lowest	
			basin. Five of seven are currently	
			discussed. If the sections are not	
			combined, please provide a reference to	
			Exhibit 3-19 in the Total Miles	
			paragraph rather than in the Total	
			Segments paragraph.	
29	U.S. EPA Region 8	03/29/11	Written comment: Exhibit 3-22, p. 3-15,	There are subtle differences between aquatic life
	0.2.211110810110	00,25,11	Aquatic Life Warm Water 1 is missing	classifications 1 & 2, with those differences mainly
			from the table. It appears likely this is	involving dissolved oxygen levels, chlorine
			what is meant by Aquatic Life Water in	standards, and associated spawning requirements.
			the third row from the bottom.	Given the broad nature of the SWQMP, and the
			the time tow from the bottom.	expected diverse audience, the segregation between
				aquatic life classifications is unwarranted. Exhibit
				-
				3-22 has been updated to combine both levels of
				classification into a single entry for either warm or
20	HC EDID : 0	00/00/11	W	cold aquatic life uses.
30	U.S. EPA Region 8	03/29/11	Written comment: Section 3.3.1, p. 3-22	See response to comment 29.
			and Exhibit 3-30, pp. 3-61 and 3-62,	
			Early in the chapter, the discussion of	
			standards and 303(d) listings were	
			divided into aquatic life cold water 1 and	
			2 and aquatic life warm water 1 and 2.	
			In Section 3.3, the analysis shifts and	
			combines listings for both 1 and 2 into a	
			single category for "aquatic life cold	
			water" and "aquatic life warm water".	
			<u> </u>	
1 1			This makes comparison with the earlier	

			1 4 1'00' 1, 771	
			chapters somewhat more difficult. The	
			same shift occurs in the basin chapters.	
			If this is the best way to display and	
			discuss the data, a brief discussion of the	
			change either in the text or as a footnote	
			to Exhibit 3-30 and in the appropriate	
			sections/exhibits of the basin chapters	
			(e.g. 6-40) would be helpful.	
31	U.S. EPA Region 8	03/29/11	Written comment: Exhibit 3-30, pp. 3-	Exhibit 3-30 is a standard template that was
	0.101 =====0		61 and 3-62, EPA notices that the "Not	developed to summarize impaired segments, and is
			Suitable for Recreation" Column in	used for parallel exhibits for the individual basin
			Exhibit 3-30 is always 0. If there are not	summaries. Even though there are currently no
			impaired segments under this use, is it	known impairments classified as "Not Suitable for
			important to keep the column or could it	Recreation", there could be future impairments that
			be removed to simplify the table?	fall in this category. This column has been left in
			be removed to simplify the table?	
				the tables, and will be re-evaluated during future
			EPA understands that the total number of	versions of the SWQMP.
			segments is not necessarily the same as	
			the total sum of the use categories not	The entry for the total number of impaired
			attained. We would expect the total	segments for the Republican basin should report
			segments to be the same as or greater	only one segment. Exhibit 3-30 has been corrected
			than the sum of the "use categories not	to reflect that there is currently only one impaired
			being attained", which is the case for all	segment within the Republican River Basin.
			basins except the Republican. EPA	
			notices that the total number of impaired	
			segments for the Republican River is	
			four (4), but only one segment/use	
			category (1 under Existing Recreation) is	
			listed. Please correct if there is an error	
			or add a footnote explaining the data if	
			there is another reason for the apparent	
			± ±	
			discrepancy.	

22	HIG EDA D : 0	02/20/11	W.: E 1:1:: 0.20	m
32	U.S. EPA Region 8	03/29/11	Written comment: Exhibit 3-33, p. 3-65,	The entry for the Colorado River in Exhibit 3-33
			EPA understands that the total number of	has been corrected to read eight under the "No. of
			segments is not necessarily the same as	Impaired Segments" column.
			the total sum of the use categories not	
			attained. We would expect the total	
			segments to be the same as or greater	
			than the sum of "use categories not being	
			attained", which is the case for all basins	
			except the Colorado. EPA notices that	
			the total impaired segments for the	
			Colorado River is nine (9) but the sum of	
			use categories not being attained is only	
			eight (8). Please correct if there is an	
			error or add a footnote explaining the	
			data if there is another reason for the	
			apparent discrepancy.	
33	U.S. EPA Region 8	03/29/11	Written comment: Section 3.3.3, p. 3-	The comment is resolved in the Final Draft
			23, The last paragraph states that the	SWQMP. The revised text is as follows:
			Platte River Basin lakes and reservoirs	
			are experiencing the greatest number of	The assessed lakes/reservoirs in the Platte River
			impairments, which is certainly reflected	Basin are experiencing exhibiting the greatest
			in the data. EPA wonders if this	number of impairments when compared to the other
			apparently high rate of impairment	basins. Because assessments are based on WQCD
			reflects a greater number of assessed	data as well as third party data and because the
			lakes/reservoirs compared to other	amount of WQCD lakes/reservoirs data is relatively
			basins. If so, it may be helpful to	uniform across all basins, this greater number of
			include this information.	impairments may reflect more third party data
			merade ans information.	available in the Platte River Basin.
				available in the Flatte Kivel Dasin.
34	U.S. EPA Region 8	03/29/11	Written comment: Section 3.3.2, p. 3-	While the geographic distribution of segments
34	U.S. El A Region o	03/27/11	24, EPA wonders why sediment – in six	listed for sediment on the Monitoring and
			of seven basins according to Exhibit 3-	Evaluation list is greater than some of the other
				<u> </u>
			35 (p. $3-67$) – is not discussed in this	pollutants called out for specific discussion, the

			paragraph when pollutants occurring in	analysis in the text presents most prevalent
			three or four of the seven basins are	pollutants based on total number of segments listed
			discussed.	for each pollutant, not geographic distribution of
				those listings.
35	U.S. EPA Region 8	03/29/11	Written comment: Section 3.3.2, p. 3-	The text portion should read that "Copper was
			24, The second paragraph of this section	identified as needing to be assessed in six of the
			includes the statement: "Copper and	seven basins (86%). Selenium was identified as
			selenium were identified as needing to	needing to be assessed in five of the seven basins
			be assessed in five of the seven (71%)	(71%)." These changes have been made to the text
			river basins." This does not accord with	on p.3-24.
			Exhibit 3-35, which indicates that six of	
			the seven river basins require further	
			assessment of copper. EPA requests that	
			either Section 3.3.2 or Exhibit 3-35 be	
			edited to reflect the correct information.	
36	U.S. EPA Region 8	03/29/11	Written comment: Section 3.3.3, p. 3-	The comment is resolved in the Final Draft
			24, EPA suggests it may be helpful to	SWQMP. The revised text is as follows:
			describe what the sources "not assessed"	
			and "unknown" mean in the context of	Two additional categories of sources – not assessed
			the Integrated Report in this paragraph.	and unknown – are identified, <u>meaning these</u>
			It may be helpful to the reader for	sources are yet to be determined.
			interpretation of Exhibit 3-36. They are	
			the most commonly assigned "sources of	
			impairment", and may be confusing to	
			readers unfamiliar with the process.	
37	U.S. EPA Region 8	03/29/11	Written comment: Exhibit 3-37, pp. 3-	The WQCD agrees with the comment and
			26 and 27, It may be helpful to use a	appreciates the solution offered. However, the
			different line color in the blue and dark	WQCD is unable to address document style issues
			green columns. The blue lines are	at this time. The comment will be resolved in
			poorly visible or invisible.	future SWQMP updates.
38	U.S. EPA Region 8	03/29/11	Written comment: Exhibit 3-37, p. 3-27,	Yes, this can mean that a TMDL has been
			Footnote 1 in this section includes the	completed but the segment is not yet meeting its
			following statement:	standard for the use classification(s). No, the word

			When the total number of TMDLs to be developed is less than the total number of distinct segments impaired, it typically means that one or more individual segments were identified as impaired in a previous CWA section 303(d) listing cycle. However, in the latest monitoring cycle the segments showed that they are not meeting the standard(s) for one or more assigned used classifications. Please clarify the intended meaning of this text. Does this mean that a TMDL has been completed, but the segment is not yet meeting its standard for the use classification(s)? Is the word "not" (bold	not is necessary because in order for total number of segments requiring TMDL development to be less than total number of distinct segments impaired, the segments must be Category 4a or 4b, both of which do not meet standards for one or more assigned use classifications.
39	U.S. EPA Region 8	03/29/11	added) in error? Written comment: Section 3.5, p. 3-30, EPA suggests it may be helpful to explain in the text or as a footnote to Exhibit 3-40 that the nonpoint source category here does not include projects funded by Colorado's Nonpoint Source Program using Clean Water Section 319 funds. While the disclaimer indicates that this list is from the IUP only, the Nonpoint Source category here is also the name of a completely different funding program, which may be confusing to unfamiliar readers. It may also be helpful to explain whether or not the Stormwater category is only for	The comment is resolved in the Final Draft SWQMP. Footnotes have been added to Exhibit 3-40 as follows: ¹ Nonpoint source projects do not include projects funded through CWA Section 319. ² Stormwater projects address both point and nonpoint sources.

			permitted stormwater projects or includes both defined point and nonpoint	
			source projects.	
40	U.S. EPA Region 8	03/29/11	Written comment: Section 4.4, p. 4-6,	The comments are resolved in the Final Draft
	_		EPA suggests adding a reference to	SWQMP. The revised text is as follows:
			Colorado's Watershed Planning	
			Cookbook on the NPS Colorado website	There are a number of resources available to assist
			to the second paragraph on page 4-6.	planners with strategy development, including
			EPA's handbook is also an excellent	establishing goals and objectives, such as EPA's
			reference and very useful in conjunction	Handbook for Developing Watershed Plans to
			with the Cookbook; however, WQCD	Restore and Protect Our Waters (USEPA 2005a)
			encourages the use of the Cookbook as	and Colorado's Watershed Cookbook: Recipe for a
			the preferred format for watershed	Watershed Plan (WQCD 2010a).
			planning in Colorado. There is a	
			reference to Colorado's NPS website in	WQCD. 2010a. Colorado's Watershed Cookbook:
			Exhibit 4-2. The Cookbook and	Recipe for a Watershed Plan.
			Colorado NPS website should also be	http://www.npscolorado.com/watershedplan.htm .
			added to the reference list at the end of	Accessed May 31, 2011.
			the Chapter.	
				With respect to referencing the Colorado NPS
			The sidebar on page 4-6 is difficult to	website, it is already cited in the Chapter 4
			read when printed. The texture of the	References section.
			background tends to interfere with the	
			text, making it difficult to read. The	With respect to the sidebar comment, the WQCD
			bullet color is also very close to the	agrees and appreciates the solutions offered.
			background color when printed. Larger	However, the WQCD is unable to address
			text or higher contrast between text and	document style issues at this time. The comment
			background may be helpful.	will be resolved in future SWQMP updates.
41	U.S. EPA Region 8	03/29/11	Written comment: Section 4.5, p. 4-7,	The WQCD agrees with the comment. However,
			The sidebar on page 4-7 is difficult to	the WQCD is unable to address document style
			read when printed. There is low contrast	issues at this time. The comment will be resolved
			between text color and background	in future SWQMP updates.
			texture.	

42	U.S. EPA Region 8	03/29/11	Written comment: Section 4.5.2, p. 4-9, EPA recommends changing the last sentence of this section to read as follows: Therefore, before selecting a wetland as a treatment option for reducing nitrogen, the farm manager should analyze the return water for other pollutants (such as pesticides and selenium) that might be harmful to the wetland biota.	The comment is incorporated in the Final Draft SWQMP. The text is revised as follows: Therefore, before selecting a wetland as a treatment option for reducing nitrogen, the farm manager should analyze the return water for the other pollutants (such as pesticides and selenium) that might be harmful to the wetland biota should be analyzed.
43	U.S. EPA Region 8	03/29/11	Written comment: Section 4.5.5.2, p. 4-11, In the second paragraph, it may be helpful to clarify what is meant by the word "drainage" in the following sentence: "The permit will not apply to discharges from agricultural drainages because they are specifically exempted from permitting requirements under the CWA." Because "drainage" may mean either a watershed area or a return flow from a ditch, tile or other drain, it would be helpful to clarify which meaning is being used in this context.	The comment is addressed in the Final Draft SWQMP. The text is revised as follows: The permit will not apply to discharges from agricultural drainages tiles or drains because they are specifically exempted from permitting requirements under the CWA.
44	U.S. EPA Region 8	03/29/11	Written comment: Section 4.7.1, p. 4-16, EPA recommends editing the first sentence of this section to appear as follows: In numerous locations throughout the state, rivers and streams have been channelized for a variety of purposes.	The comment is incorporated in the Final Draft SWQMP. The text is revised as follows: In numerous locations throughout the state, rivers and streams have been channelized for a variety of purposes.

45	U.S. EPA Region 8	03/29/11	Written comment: Section 4.10, p. 4-23, EPA believes it may be useful to the reader to add the commonly recognized, poisonous metalloid arsenic to the discussion in the second paragraph of this section. It is readily recognized by many people as a human and ecological health concern and is also common in acid mine drainage and waste rock.	The comment is addressed in the Final Draft SWQMP. The text is revised as follows: Acid mine drainage contains metals (leachates of iron, copper, zinc, manganese, cadmium, and lead, and arsenic) which can runoff into streams.
46	U.S. EPA Region 8	03/29/11	Written comment: Section 4.10.2.4, p. 4-26, The following sentence appears on the sub-heading "Diversion of Surface Waters": This BMP involves diverting clean water that may be entering the mine site where it could come in contact with sulfate bearing materials and result in acid mine drainage. EPA requests that the State consider whether the reference to "sulfate" correct. Is "sulfide" the intended term? Contact with sulfides, like pyrite (FeS) typically causes acid mine drainage.	The comment is addressed in the Final Draft SWQMP. The text is revised as follows: This BMP involve diverting clean water that may be entering the mine site where it could come in contact with sulfate sulfide bearing materials and result in acid mine drainage.
47	U.S. EPA Region 8	03/29/11	Written comment: Possible duplication: the 2005 supplement to the Colorado Nonpoint Source Management Plan is listed under both CDPHE and WQCD.	The comment is addressed in the Final Draft SWQMP. CDPHE is no longer referenced specific to the 2005 NPS Supplement.
48	WQCC Administrator Frohardt	04/11/11	Hearing comment: Because of the overlap between the content of the SWQMP and the content of the Continuing Planning Process (CPP)	In developing the SWQMP the WQCD purposefully identified the CPP as a separate document (q.v. Exhibit 2-3). This was due to the requirement in the Clean Water Act (CWA) under

			document, the Division needs to evaluate how the SWQMP and CPP integrate, e.g., should they be separate documents or the same document; if they are separate documents, what information should be included in each document?	section 303(e) requiring each state to have an approved CPP. The CPP currently focuses on the key processes involved with water quality management, but doesn't necessarily identify basin-specific, or even statewide water quality issues. The current version of the SWQMP is designed to summarize basin-specific and statewide water quality issues. Future versions of the SWQMP would then address various approaches to addressing these basin-specific and statewide water quality issues. EPA Region VIII staff has indicated that this approach is consistent with CWA sections 303(e) and 205(j), and recommends that the future version of the CPP reference the SWQMP as a process element of Colorado's statewide water-quality management. At this point the integration of the CPP with the SWQMP appears to be premature, and the WQCD would recommend maintaining both as separate documents. However, as future versions of the SWQMP are developed, the need for separate documents for process and issue identification may become less apparent, at which point it may be useful to integrate the CPP and SWQMP.
49	WQCC Commissioner Butler	03/22/11	Written comment: In Chapter 3, request for inclusion of information specific to how many Total Maximum Daily Loads have been completed but not fully implemented.	The WQCD will investigate the possibility of including an additional column in Exhibit 3-38 for future versions of the SWQMP. In the meantime, additional text has been added to section 3.4.4 to further address TMDL implementation.
			Perhaps add a column to Exhibit 3-38 describing number of segments attaining uses. As an example, in the Basin Plans,	

	ı		d	
			there is a table in the Total Maximum	
			Daily Load section that includes "Was	
			the Use Attained in the latest WQCD	
			Assessment."	
50	WQCC	03/22/11	Written comment: Exhibit 9-2, lower	Zinc has been added as a stressor to Exhibit 9-2.
	Commissioner		right hand corner, add zinc as primary	
	Butler		stressor. Zinc is the worst stressor in the	
			Animas, more so than copper and	
			cadmium, and it may be a significant	
			stressor in other mineralized areas.	
51	WQCC	03/22/11	Written comment: P. 9-2, there are three	The text on page 9-2 has been modified to include
	Commissioner		ski areas mentioned in the San Juan	Ski Hesperus and Silverton Mountain as ski areas in
	Butler		Basin, but actually, there are five. List	the basin.
			should be revised to include Ski	
			Hesperus and Silverton Mountain.	
52	WQCC	03/22/11	Written comment: P. 9-4, in the	The text on page 9-4 has been modified to include
	Commissioner		discussion of areas preserved to protect	the Canyons of the Ancients National Monument in
	Butler		the remnants of ancient cultures, add	the list of ancient cultural sites.
			Canyons of the Ancients National	
			Monument which is much bigger than	
			some of the other monuments	
			mentioned.	
53	WQCC	03/22/11	Written comment: P. 9-12, 13, clarify if	The second sentence of the first paragraph states:
	Commissioner		the Water Quality Control Division	"The WQCD uses the monitoring data to issue fish
	Butler		issues Fish Consumption Advisories.	consumption advisories (FCAs) to the public as
			Also, in the March Water Quality	warranted."
			Control Commission meeting a new	
			methodology and assessment for the	Per the response to comment one, the WQCD has
			303(d) list was adopted. The new	added a new appendix A, which documents the
			methodology states that a segment with a	adopted and effective date for WQCC policies and
			Fish Consumption Advisory is no longer	regulations. Even though the 303(d) Listing
			automatically on the 303(d) list. That	Methodology is not a formal WQCC policy, it is
			change for the future might be noted.	reviewed and approved by the WQCC in odd-
L	J		change for the fature inight be noted.	10 ne med and approved by the mode in odd

				numbered years of the 303(d) listing cycle. Since the Listing Methodology undergoes review and approval before the WQCC, the WQCD has included this in Appendix A. This version of the SWQMP was developed using the 2010 303(d) list, and listing decisions were therefore based on the Listing Methodology adopted in 2009. To remain consistent with other sections in the SWQMP the WQCD has elected not to include additional narrative reflective of changes to the Listing Methodology that was adopted in 2011. Additional narrative regarding FCA will be will be added when the SWQMP is updated to include the 2012 303(d) list.
54	WQCC Commissioner	03/22/11	Written comment: Exhibit 9-34, p. 9-18, the segment descriptions for the Animas	The segment description for Animas 4a and 4b has been corrected in Exhibits 9-34, 9-29, and 9-35.
	Butler		4a and 4b are incorrect. Those segments	
			were changed in 2001. 4a goes down to	
			Deer Park Creek, and 4b starts at Deer	
			Park Creek and goes down to Baker's Bridge. Exhibit 9-19 has the correct	
			segment descriptions, and Exhibits 9-29	
			and 9-35 again have the incorrect	
			segment descriptions.	
55	WQCC	03/22/11	Written comment: Exhibit 9-11 is the	The appropriate population estimates have been
	Commissioner	03/22/11	wrong figure. It looks like it came out of	included in Exhibit 9-11.
	Butler		the Arkansas Basin Chapter.	
56	WQCC	04/11/11	Hearing comment: How often is will the	In order to be a viable planning tool, the SWQMP
	Commissioner		SWQMP be updated? It is strongly	must be systematically updated to reflect ongoing
	Butler		recommended the document be	water quality developments within the state. One
			systematically updated and lessons	option considered by the WQCD was the biennial
			learned about data and information	303(d) listing process. When considering the
			management be incorporated into that	frequency of updates to the SWQMP the WQCD

Final Draft – June 1, 2011

			system. One option is to update the SWQMP after the 303(d) list updates; this would ensure things such as delistings are reflected in the SWQMP in a more timely way.	considered several factors; including current workload commitments and existing Division processes, available resources to devote to the SWQMP development, and the need to develop additional outreach opportunities with stakeholder groups statewide. In attempting to balance these various factors, the WQCD decided the most advantageous approach was to utilize the WQCC triennial regulatory review process. This approach allows for the systematic update of basin chapters coincident with any regulatory changes the WQCC may elect to adopt, as well as the ability to address overview chapters when Regulation No. 31 undergoes triennial review. While this approach has the disadvantage of spanning multiple 303(d) biennial listing and Integrated Report cycles, the WQCD felt it represents a realistic schedule considering ongoing work and resource commitments.
57	WQCC Commissioner Butler	04/11/11	Hearing comment: In Chapter 3, funding needs to implement TMDLs should be highlighted.	Additional narrative regarding TMDL implementation, including funding issues, have been included in Section 3.4.4.
58	WQCC Commissioner Butler	04/11/11	Hearing comment: San Juan River Basin should perhaps be renamed San Juan/Dolores.	The WQCD agrees with the comment. However, the WQCD is unable to address the issue at this time. The comment will be resolved in future SWQMP updates.
59	WQCC Commissioner Butler	04/11/11	Hearing comment: Typos should be addressed.	All typographical errors identified in comments, as well as any others discovered during the process of preparing the final draft, have been addressed.
60	WQCC Commissioner Butler	04/18/11	Written comment: Page 9-2, middle of page, "All of the Dolores is included in the area designated as the San Juan Basin even though the Dolores is not tributary	The WQCD agrees with the comment. However, the WQCD is unable to address the issue at this time. The comment will be resolved in future SWQMP updates.

Final Draft – June 1, 2011

			to the San Juan. The Dolores" As mentioned at the hearing, I would prefer that the area be called the San Juan and Dolores Basins. The other option is to rename to Southwest Basins. I realize changing all the references could be very time consuming.	
61	WQCC Commissioner Butler	04/18/11	Written comment: Page 9-8, first full paragraph, The San Juan River does not pass through the Ute Mountain Ute Reservation before entering New Mexico.	The text on page 9-8 has been modified to reflect that the San Juan River doesn't flow through the Ute Mountain Ute Reservation before entering New Mexico.
62	WQCC Commissioner Klomp	04/11/11	Hearing comment: Chapter 3 should be used as a 101 course about the state's water quality for all Colorado citizens.	Thank you for your comment.
63	WQCC Commissioner Klomp	04/11/11	Hearing comment: What data were used for the trend analyses?	For the trend analysis long-term WQCD monitoring stations in close proximity to surface water gauging stations were selected so that flow data could be included in the analysis. Several chemical parameters were examined for possible analysis. These included: dissolved oxygen, total dissolved solids (or specific conductance), total phosphorus, total suspended sediment, selenium, nitrates, and temperature. Preliminary analysis of potential water quality trends indicated that there was insufficient data from all stations to establish a meaningful interpretation at a statewide level. Thus, long-term trend data was identified as a data gap in Chapter 5 (p. 5-2). The intent of the WQCD is to examine and address the identified data gaps in chapter 5 during future SWQMP versions.

64	WQCC Commissioner McConaughy	04/11/11	Hearing comment: How will the Division resolve public comments received? Are there any public comments with which the Division disagrees?	The Division intends to address public comments through two ongoing activities. First, for the current version of the SWQMP this Comment Resolution document will be combined with Citizen Advisory Group comments and the identified data gaps from chapter five, which combined will be utilized to identify short- and long-term SWQMP priorities. Second, the WQCD plans to conduct, in conjunction with updates to specific basins, more focused outreach in the particular basin.
65	WQCC Commissioner McConaughy	04/11/11	Hearing comment: How will the request for inclusion of Segment 13e be addressed? Why not include Segment 13e? Segment 13e should be included as the text is revised.	Please see the response to comment 1.
66	WQCC Commissioner McConaughy	04/11/11	Hearing comment: Specify the reporting date (identifying effective dates for regs/permits, i.e., specifically identifying the scope of the SWQMP) for all information in all chapters, so it is clear why more recent information is not included.	Please see the response to comment 1.
67	WQCC Commissioner Sakata	04/11/11	Hearing comment: Is the CPP a requirement?	Please see the response to comment 48.
68	WQCC Commissioner Sakata	04/11/11	Hearing comment: Typos should be addressed.	All typographical errors identified in comments, as well as any others discovered during the process of preparing the final draft, have been addressed.
69	WQCC Commissioner Sakata	04/20/11	Written comment: Throughout the document starting with page iv ARRA is reference as "American Recovery and Investment Act" when it should be Reinvestment Act.	This typographical error has been corrected in the final version.

70	WQCC Commissioner Sakata	04/20/11	Written Comment: Page 1-1 section 1.1 under major goal 1 reword "current conditions" to reflect the discussion from the Commission meeting about updates and what date this iteration is based on.	Please see the response to comment 1.
71	WQCC Commissioner Sakata	04/20/11	Written Comment: Page 1-1 last line of section 1.1: ARRA"Reinvestment", and also the footnote.	This typographical error has been corrected in the final version.
72	WQCC Commissioner Sakata	04/20/11	Written Comment: Page 2-14: ARRA	This typographical error has been corrected in the final version.
73	WQCC Commissioner Sakata	04/20/11	Written Comment: Page 2-18, Section 2.3.2.2, second paragraph, third line - Insert the word "the" before WQCD. This also occurs in several other places within the document.	This typographical error has been corrected in the final version.
74	WQCC Commissioner Sakata	04/20/11	Written Comment: Page 3-3, Section 3.1.2, last paragraph, line seven, There are five federal candidate species, all of which "ARE" plants.	This typographical error has been corrected in the final version.
75	WQCC Commissioner Sakata	04/20/11	Written Comment: Page 11-18, Exhibit 11-36, City of Brightonno indication if table values apply	This typographical error has been corrected in the final version.
76	WQCC Commissioner Sakata	04/20/11	Written Comment: Page 11-21, Under "Denver Basin", Second paragraph, line two, "Arapaho"	This typographical error has been corrected in the final version.
77	WQCC Commissioner Sakata	04/20/11	Written Comment: Page 11-25; Exhibit 11-74 -Several places where "Aquatic Life Use" is listed as a Pollutant Causing Impairment. Perhaps list as "Cause Unknown" with a footnote explaining that it was listed on the 303(d) list as impaired due to of aquatic life use.	Exhibits 11-74 and 11-75 both represent summary tables that were created using EPA's national Assessment Database (ADB). The ADB header for column three of Exhibit 11-75, and column seven of Exhibit 11-75, is reported as the "cause", while column five of Exhibit 11-74 is reported as the "source". ADB guidance dictates how these

Final Draft – June 1, 2011

				database records are to be entered and maintained. During early development of various TMDL related exhibits it was decided that cause and source were not descriptive enough, and could lead to confusion regarding identified sources. In an attempt to clarify, the "cause" column was relabeled "pollutants". While this addresses the straight forward instance when the cause of an impairment is readily identified, it does not address the situations when an impairment exists but lacks an identified "source" (e.g. Aquatic Life Use, Dissolved Oxygen, etc.). To more accurately reflect the situation, and allow the WQCD to continue to utilize the ADB as a data source for these tables, the "Pollutant" column header has been changed to "Impairment". This change was also made for the analogous exhibits in the other basin chapters.
78	WQCC Commissioner Sakata	04/20/11	Written Comment: Page 11-30; Exhibit 11-75 - This is where "Aquatic Life Use" is listed as a Pollutant Causing Impairment. I would suggestion instead listing it as Cause Unknown" with a footnote explaining that it was listed on the 303(d) list as impaired due to impairment of aquatic life use.	See response regarding Exhibit 11-74.
79	WQCC Commissioner Todd	04/11/11	Hearing comment: Footnotes associated with water withdrawal tables seem repetitive with the text; this should be addressed.	The WQCD recognizes that in Section 3.1.6 the narrative footnote (text footnote 4, p.3-8) and Exhibit 3-10 footnote (column footnote 1, p.3-9) are essentially identical. However, the definition of a community water system, within the context of the Safe Drinking Water Act is an important, and

				often overlooked, distinction. To ensure that either the text or the exhibit is not taken out of context, the WQCD has elected to leave both footnotes.
80	WQCC Commissioner Todd	04/11/11	Hearing comment: Typos should be addressed.	All typographical errors identified in comments, as well as any others discovered during the process of preparing the final draft, have been addressed.
81	WQCC Commissioner Todd	04/11/11	Written comment: Exhibit 7-60, Hensen should be Henson.	This typographical error has been corrected in the final version.
82	WQCC Commissioner Todd	04/11/11	Written comment: Exhibit 7-28 through 7-31, footnote 1 not referenced in the table themselves.	This typographical error has been corrected in the final version.
83	WQCC Commissioner Todd	04/11/11	Written comment: Exhibit 7-22, Segments 2, 5 Arapahoe should read Arapaho	This typographical error has been corrected in the final version.
84	WQCC Commissioner Todd	04/11/11	Written comment: Exhibit 7-61, population in Peru Creek watershed. Could this actually be the Snake River Watershed?	The cited population estimate was for the Snake River watershed and not Peru Creek. This sentence in Exhibit 7-61 has been modified per the following: "The year round population in the Peru Creek Snake River watershed is 3,000; it increases to over 20,000 during ski season". Additionally, this revised sentence has been moved to the first paragraph of the watershed description.
85	WQCC Commissioner Todd	04/11/11	Written comment: Exhibit 7-61, Hensen Creek should be Henson Creek.	This typographical error has been corrected in the final version.
86	WQCC Commissioner Todd	04/11/11	Written comment: Exhibit 10-32, segment 3a, Alamose should read Alamosa.	This typographical error has been corrected in the final version.
87	WQCC Commissioner Todd	04/11/11	Written comment: Exhibit 10-33, segment 6, San Louis Lake should read San Luis Lake.	This typographical error has been corrected in the final version.

88	WQCC	04/11/11	Written comment: Exhibit 10-34,	This typographical error has been corrected in the
	Commissioner		segment 27, Smite Reservoir should read	final version.
	Todd		Smith Reservoir.	
89	WQCC	04/11/11	Written comment: Exhibit 10-34,	This typographical error has been corrected in the
	Commissioner		segment 2, La Carita Creek should read	final version.
	Todd		La Garita Creek	
90	WQCC	04/11/11	Written comment: page 11-36, last	This typographical error has been corrected in the
	Commissioner		paragraph, space needed after the	final version.
	Todd		number 1	
91	WQCC	04/11/11	Written comment: Exhibit 10-22,	The Exhibit 10-22, correctly cites the trophic status
	Commissioner		Shouldn't the San Luis Lake be	of San Luis Lake based on what was reported in the
	Todd		mesotrophic according to the TSI	2002 Integrated Report. The trophic status in 2002
			footnote?	was determined by averaging the TSI scores for
				chlorophyll a, total phosphorus and Secchi depth.
				In 2002 the average TSI trophic status for San Luis
				Lake was eutrophic.
				Since 2006, the trophic Status reported in the IR is
				based only on chlorophyll a TSIs. Based on this
				new assessment approach, San Luis Lake would be
				classified as mesotrophic.
				classified as incsotropine.
				To clarify the difference between assessing trophic
				status in 2002 and 2006 the following footnote has
				been added to Exhibit 10-22: ² In 2002 the
				determination of trophic status was based on an
				average TSI score for chlorophyll a, total
				phosphorus and Secchi depth. Since 2006 trophic
				status is based only on the chlorophyll a TSI, and
				therefore San Luis lake would be classified as
				mesotrophic.

Final Draft – June 1, 2011

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92	WQCC	04/11/11	Written comment: Exhibit 12-12,	For the SWQMP the WQCD utilized the same
	Commissioner		1,160,362 jobs for an increased	demographic data that the Colorado Water
	Todd		population estimate of 47, 206 people.	Conservation Board (CWCB) has used in their
			Appears the table of job estimates looks	ongoing water supply planning efforts. However,
			off.	one difference between the two planning
				approaches is that the CWCB considers the
				Republican River Basin along with the South Platte
				*
				Basin, while within the SWQMP the WQCD has
				elected to consider the Republican River Basin
				individually.
				The CWCB demographic data the WQCD data
				utilized had detailed population estimates by
				1 · · · · · · · · · · · · · · · · · · ·
				county, but job projections were aggregated
				according to the CWCB basins. In order to
				estimate population changes for the Republican
				Basin the county population data was separated
				using GIS assessment of the areal portion of each
				county that overlaps the South Platte and
				Republican River basins. A similar GIS process
				was used for the job projections. However, since
				the original job projections were based on basin
				estimates, the jobs estimate was based on the areal
				proportion of the Republican basin compared to the
				1
				total areas of the CWCB defined South Platte basin.
				This approach, based only on GIS derived areal
				percentages, overestimates future job growth as it
				doesn't account for the major front range
				population centers.
				Rather than project jobs growth using an areally
				based GIS approach, job estimates were revised
				based on the population estimates. This approach

93	WQCC Commissioner Wiant	04/11/11	Hearing comment: The Division should maximize the accessibility of the document to the public, i.e., those without background in water quality should be able to fully utilize the SWQMP as a resource of information. One suggestion is to add a summary page at the beginning of each chapter to announce the chapter contents in a more accessible way to the public. Perhaps the document should be read by a nonwater quality person to solicit other ideas about accessibility.	has several advantages. First more detailed county level population data are available, and secondly, this approach inherently accounts for the front range population centers. Based on this revised analysis, estimates for jobs growth are a function of population growth. For 2050, population growth within the Republican River Basin was estimated to be approximately 1% that of the CWCB defined South Platte Basin. Using this change in population as an estimate of the corresponding job growth, the revised job growth estimate for the Republican River basin is 34,393. Exhibit 12-12 has been updated to reflect this new estimate, and the footnote modified to address the change in how the estimate was derived. WQCD is working with several groups to identify individuals not familiar with water quality management in Colorado who are interested in reviewing the SWQMP; the focus is to solicit ideas on how to maximize public accessibility to the information in the SWQMP. The feedback received will be incorporated as part of future SWQMP updates.
94	WQCC Commissioner Wiant	04/11/11	Hearing comment: Are there any major policy implications associated with public comments received with which the Division disagrees?	Please see the response to comment 64.

95	WQCC Commissioner	04/11/11	Hearing comment: Continue tracking issues not yet resolvable for potential	Please see the response to comment 64.
	Wiant		future resolution.	
96	WQCD Director Gunderson	04/11/11	Hearing comment: The basins defined in the SWQMP should overlap with the rulemaking basins; is that the case?	During the development of the SWQMP several factors were considered during the definition of SWQMP basin boundaries. Rulemaking basins were one consideration, but other factors included available water quality and corresponding flow data, regulations not corresponding to watersheds (e.g. upper and lower Colorado), and other sources of data – particularly the CWCB information. The SWQMP deliberately approached the basin definition in a 'true' watershed approach, consistent with EPAs 40 CFR part 130.6. The WQCD is of the opinion, that future SWAMP outreach to various local water quality planning agencies will be facilitated by a 'true' watershed approach. The WQCD is aware that the SWQMP basins do not exactly match rulemaking basin, but is working on establishing a process to track those differences.